

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

VANESSA BOWIE-MIDDLETON,

Plaintiff,

vs.

WASHOE COUNTY SCHOOL DISTRICT,

Defendant.

CASE NO.: 3:24-cv-00320-ART-CLB

ORDER GRANTING

**STIPULATION TO EXTEND
TIME TO FILE REPLY IN
SUPPORT OF WASHOE COUNTY
SCHOOL DISTRICT'S MOTION
TO DISMISS AMENDED
COMPLAINT**

COMES NOW, Defendant Washoe County School District (District) and Plaintiff Vanessa Bowie-Middleton (Plaintiff), by and through their respective counsel of record, and hereby stipulate and agree, pursuant to Federal Rules of Civil Procedure 6(b) and Civil Local Rule IA 6-1, to extend the deadline for the District's reply in support of its Motion to Dismiss Amended Complaint to February 7, 2025. This Stipulation is based on the following:

1. Plaintiff filed her Complaint on Complaint on July 23, 2024. (ECF No. 1)
2. Plaintiff filed her Amended Complaint on Complaint on August 20, 2024. (ECF No. 7)
3. The District's Motion to Dismiss the Amended Complaint was filed on October 14, 2024. (ECF No. 12)

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1 4. On October 15, 2024, counsel for the parties, Terri Keyser-Cooper for Plaintiff
2 and Neil A Rombardo for the District, spoke amicably via telephone and agreed that in the event
3 the parties are able to reach settlement at or as a result of their Early Neutral Evaluation (ENE),
4 it would be in the best interests of all to await the conclusion of the ENE before Plaintiff responds
5 to the District's Motion to Dismiss. The parties are cost-conscious and cognizant that litigation is
6 expensive. The Plaintiff is a disabled cafeteria worker for the District and the District is a public
7 entity responsible to taxpayers for keeping costs down. The parties desire not to expend additional
8 time, money, and costs if the case may settle at the upcoming ENE.

9 5. On October 15, 2024, the parties also agreed to discuss the case before the ENE to
10 exchange ideas regarding the merits of the case, legal arguments, and potential for settlement.

11 6. On October 16 and 17, 2024, the parties stipulated, and the Court ordered, to stay
12 discovery until thirty (30) days after the conclusion of the ENE. (ECF Nos. 13 and 17)

13 7. On October 16 and 18, 2024, the parties stipulated, and the Court ordered, that
14 Plaintiff's Response to the District's Motion to Dismiss be extended until two weeks after the
15 ENE. (ECF Nos. 14 and 18)

16 8. The Court scheduled the parties' ENE for January 17, 2025 at 9:00 a.m. (ECF No.
17 16)

18 9. On December 27, 2024, Plaintiff filed her Opposition to the District's Motion to
19 Dismiss before the extended deadline. (ECF No. 27)

20 10. The parties respectfully request the District's reply in support of its Motion to
21 Dismiss Amended Compliant be extended to February 7, 2025, which is the date the reply would
22 have been due had Plaintiff not filed her Opposition to the District's Motion to Dismiss before
23 the extended deadline.

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11. This Stipulation is made in good faith and is not for the purposes of delay.

12. This is the Parties' first request for an extension to respond to Plaintiff's reply in support of its Motion Dismiss Amended Complaint.

IT IS SO STIPULATED.

DATED this 27th day of December, 2024.

DATED this 27th day of December, 2024.

LAW OFFICE OF
TERRI KEYSER COOPER

WASHOE COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

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Attorney for Plaintiff

Attorney for Defendant
Washoe County School District

ORDER

IT IS SO ORDERED this 31st day of December, 2024.



Anne R. Traum
United States District Judge